

In Re: Case No.: 14-32288-ABA
Michael A. Kleinman Chapter: 7
Judge: Andrew B. Altenburg, Jr.

NOTICE OF PROPOSED COMPROMISE or SETTLEMENT OF CONTROVERSY

Brian S. Thomas, Trustee, in this case proposes a compromise, or to settle a claim and/or action as described below. If you object to the settlement or compromise, you must file a written objection with the Clerk of the United States Bankruptcy Court, and serve it on the person named below not later 7 days before the hearing date.

Address of the Clerk:

U.S. Post Office and Courthouse
401 Market Street
Second Floor
Camden, NJ 08101

If an objection is filed, a hearing will be held before the Honorable Andrew B. Altenburg, Jr. on September 26, 2017 at 10:00 a.m. at the United States Bankruptcy Court, courtroom no. 4B, Mitchell H. Cohen U.S. Courthouse, 400 Cooper Street, 4th Floor, Camden, NJ 08101 (hearing to be scheduled for at least 28 days from the date of the filing of the notice). If no objection is filed the clerk will enter a *Certification of No Objection* and the settlement may be completed as proposed.

Nature of action: Debtor is a member of an LLC, Michael Kleinman, D.O., LLC, (collectively the "Kleinman Entities"). His LLC owns a medical condominium located at 750 Route 73 South, Marlton, New Jersey (the "Property"). Although the Property is encumbered by a mortgage, the Trustee believes that equity exists in the Property and that he could file an adversary proceeding to take possession of the property, sell it, and distribute the proceeds to creditors. In response, the Kleinman Entities asserted various credits to reduce the amount of potential equity in the Property and alleged certain defenses to the Trustee's claims regarding his ownership interest in the Property. To avoid the risks and costs of litigation, the parties desire to resolve the dispute.

Case 14-32288-ABA Doc 60 Filed 08/27/17 Entered 08/28/17 00:44:02 Desc Imaged
Pertinent terms of settlement ~~Defendants shall pay the Plaintiff \$245,000.00 in a lump sum payment~~
within ten days of the entry of a final Order of the Bankruptcy Court approving the proposed Notice of
Settlement of Controversy, and the Kleinman Entities shall provide a mutual release to the Trustee and
the Bankruptcy Estate.

Objections must be served on, and requests for additional information directed to:

Name: /s/ Scott M. Zauber, Esq.

Address: Willow Ridge Executive Office Park, 750 Route 73 South, Ste 307B, Marlton, NJ 08053

Telephone No.: (609) 347-7000

rev.8/1/15

Certificate of Notice Page 3 of 4
United States Bankruptcy Court
District of New Jersey

In re:
 Michael A. Kleinman
 Debtor

Case No. 14-32288-ABA
 Chapter 7

CERTIFICATE OF NOTICE

District/off: 0312-1

User: admin
Form ID: pdf905Page 1 of 2
Total Noticed: 29

Date Rcvd: Aug 25, 2017

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Aug 27, 2017.

db +Michael A. Kleinman, 41 Maison Place, Voorhees, NJ 08043-4192
 cr +Davis & Mendelson, L.L.C., 1200 Laruel Oak Road, Ste. 101, Voorhees, NJ 08043-4317
 cr +Maison Place Homeowners Association, c/o Community Management Services Group,
 455 Larchmont Boulevard, Mt. Laurel, NJ 08054-1929
 acc +Sharer, Petree, Brotz and Snyder, 1103 Laurel Oak Road, Suite 105B,
 Voorhees, NJ 08043-4376
 515146346 American Express, Post Office Box 981540, El Paso, TX 79998-1540
 515146345 American Express, c/o Jaffe & Asher, 600 Third Avenue, New York, NY 10016-1901
 516997509 American Express Bank, FSB, c/o Becket and Lee LLP, PO Box 3001, Malvern PA 19355-0701
 516996970 American Express Centurion Bank, c/o Becket and Lee LLP, PO Box 3001,
 Malvern PA 19355-0701
 515146347 +Assistant Attorney General, Department of Justice, Tax Division,
 Civil Trial Section, Eastern Region, PO Box 227, Ben Franklin Station,
 Washington, DC 20044-0227
 515146349 Bank of America, Post Office Box 5170, Simi Valley, CA 93062-5170
 515146350 Chase, Post Office Box 9001022, Louisville, KY 40290-1022
 515787383 +Davis & Mendelson, L.L.C., c/o Sklar Law, LLC, 1200 Laurel Oak Rd., Suite 102,
 Voorhees, NJ 08043-4317
 515146351 +Eclinicalworks, Two Technology Drive, Westborough, MA 01581-1727
 515146352 +Howard Mendelsohn, Esquire, 1200 Laurel Oak Road, Voorhees, NJ 08043-4323
 515146354 +Maison Place Homeowners Association, c/o Shivers Gosnay & Greatrex, LLC,
 1415 Route 70 East/Suite 309, Cherry Hill, NJ 08034-2210
 515146355 +Mindy Kleinman, 3212 Avalon Court, Voorhees, NJ 08043-4649
 515146356 +Moore Medical, 1690 New Britain Avenue, Post Office Box 4066, Farmington, CT 06034-4066
 515146357 +NetCarrier Telecom, Inc., 4000 N. Cannon Avenue, Lansdale, PA 19446-1880
 515146358 Pitney Bowes Global Financial Services, 500 Ross Street/Suite 154-0470,
 Post Office Box 371887, Pittsburgh, PA 15262-0001
 515146359 Sanofi Pasteur, Inc., Attn: Diane DeFabio, Discovery Drive, Swiftwater, PA 18370
 515146360 +TD Bank, 401 Route 73, Voorhees, NJ 08043-9589
 515146362 ++US BANK, PO BOX 5229, CINCINNATI OH 45201-5229
 (address filed with court: US Bancorp, US Bancorp Center, 800 Nicollet Mall,
 Minneapolis, MN 55402)

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.

smg E-mail/Text: usanj.njbankr@usdoj.gov Aug 25 2017 23:20:54 U.S. Attorney, 970 Broad St.,
 Room 502, Rodino Federal Bldg., Newark, NJ 07102-2534
 smg +E-mail/Text: ustpregion03.ne.ecf@usdoj.gov Aug 25 2017 23:20:50 United States Trustee,
 Office of the United States Trustee, 1085 Raymond Blvd., One Newark Center, Suite 2100,
 Newark, NJ 07102-5235
 intp +E-mail/Text: lillian.felici@flastergreenberg.com Aug 25 2017 23:21:20 Douglas S. Stanger,
 Flaster Greenberg, Trustee for the Estate of, Mindy Kleinman, 646 Ocean Heights Avenue,
 Linwood, NJ 08221-1009
 515146353 +E-mail/Text: cio.bncmail@irs.gov Aug 25 2017 23:20:33 Internal Revenue Service,
 Post Office Box 7346, Philadelphia, PA 19101-7346
 516379695 E-mail/PDF: gecsedri@recoverycorp.com Aug 25 2017 23:24:29 Synchrony Bank,
 c/o of Recovery Management Systems Corp, 25 S.E. 2nd Avenue, Suite 1120,
 Miami, FL 33131-1605
 515146361 +E-mail/Text: usanj.njbankr@usdoj.gov Aug 25 2017 23:20:54 United States Attorney,
 970 Broad Street, 5th Floor, Newark, NJ 07102-2527
 515146348 E-mail/Text: vci.bkcy@wcredit.com Aug 25 2017 23:21:00 Audi Financial Services,
 PO Box 7247-0136, Philadelphia, PA 19170

TOTAL: 7

***** BYPASSED RECIPIENTS *****

NONE.

TOTAL: 0

Addresses marked '+' were corrected by inserting the ZIP or replacing an incorrect ZIP.
 USPS regulations require that automation-compatible mail display the correct ZIP.

Transmission times for electronic delivery are Eastern Time zone.

Addresses marked '++' were redirected to the recipient's preferred mailing address
 pursuant to 11 U.S.C. 342(f)/Fed.R.Bank.PR.2002(g)(4).

District/off: 0312-1

User: admin
Form ID: pdf905

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Date Rcvd: Aug 25, 2017

***** BYPASSED RECIPIENTS (continued) *****

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Aug 27, 2017

Signature: /s/Joseph Speetjens

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on August 24, 2017 at the address(es) listed below:

Andrew Sklar on behalf of Trustee Andrew Sklar andy@sklarlaw.com,
NJ43@ecfcbis.com;dolores@sklarlaw.com
Andrew Sklar on behalf of Creditor Davis & Mendelson, L.L.C. andy@sklarlaw.com,
dolores@sklarlaw.com
Barry W. Frost on behalf of Debtor Michael A. Kleinman bfrost@teichgrob.com
Brian Thomas on behalf of Trustee Brian Thomas brian@brianthomaslaw.com,
bthomas@ecf.epiqsystems.com
Brian Thomas brian@brianthomaslaw.com, bthomas@ecf.epiqsystems.com
Brian S. Thomas on behalf of Trustee Brian Thomas brian@brianthomaslaw.com
Denise E. Carlon on behalf of Creditor BANK OF AMERICA, N.A. dcarlon@kmllawgroup.com,
bkgroup@kmllawgroup.com
Douglas S. Stanger on behalf of Interested Party Douglas S. Stanger
doug.stanger@flastergreenberg.com, nj02@ecfcbis.com,
jackie.parsio@flastergreenberg.com;lillian.felici@flastergreenberg.com,dss@trustesolutions.net
George C. Greatrex, Jr. on behalf of Creditor Maison Place Homeowners Association
ggreatrex@sgqlawfirm.com, kmuchler@verizon.net
Joel R. Spivack on behalf of Creditor Mindy Kleinman joel@spivacklaw.com,
admin@spivacklaw.com;r44331@notify.bestcase.com
Joshua I. Goldman on behalf of Creditor BANK OF AMERICA, N.A. jgoldman@kmllawgroup.com,
bkgroup@kmllawgroup.com
Robert J. Schneider on behalf of U.S. Trustee United States Trustee
robert.j.schneider@usdoj.gov
Scott M. Zauber on behalf of Trustee Brian Thomas szauber@subranni.com,
ecf@subranni.com;ecorma@subranni.com;cwild@subranni.com;jwiesner@subranni.com;mmorrow@subranni.co
m;hinnaurato@subranni.com
United States Trustee USTPRegion03.NE.ECF@usdoj.gov

TOTAL: 14